



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHEVRON CORPORATION,

Plaintiff,

v.

Case No. 11 Civ. 0691 (LAK)

STEVEN DONZIGER, et al.,

Defendants.  
----- x

**STIPULATION**

WHEREAS, Steven Donziger ("Donziger"), Donziger & Associates, PLLC, and the Law Offices of Steven R. Donziger (together, "Donziger Defendants") are required to respond to Chevron Corporation's "Money Judgment" discovery requests and certain "Paragraph 5 Judgment Compliance" requests, as defined in the Court's Orders (Dkt. 2006, Dkt. 2020), by June 15, 2018;

WHEREAS, Donziger, by Order of the Court (Dkt. 2009) and agreement of the parties, will appear for deposition on June 25, 2018 concerning the same topics and scope; and

WHEREAS, the parties in the above-captioned action wish to avoid costly and time-consuming litigation and thus have agreed to try to resolve their ongoing dispute over allegedly privileged documents in Donziger's production;

NOW, THEREFORE, IT IS STIPULATED by and between, Chevron, Donziger, and the Donziger Defendants, that Donziger may produce responsive documents that he contends are privileged and/or work product to Chevron pursuant to this stipulation and Chevron shall not

argue that such disclosure constitutes a subject matter waiver of any privilege or protection pursuant to Rule 502(d) of the Federal Rules of Evidence; and

IT IS FURTHER STIPULATED that, Chevron will identify which of the produced documents and responses it intends to use, and that Donziger and the Donziger Defendants have seven (7) days to either acknowledge that they are not privileged and/or assert any applicable privilege; and

IT IS FURTHER STIPULATED that, except as explicitly stated herein, the parties to this Stipulation do not waive any rights or protections afforded them by the Court's individual practices, applicable Local Civil Rules, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, or other applicable authority, including, but not limited to, work product and attorney-client privileges, and this Stipulation is without prejudice to any parties' rights thereunder.

SO STIPULATED.

Dated: June 15, 2018

By:

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By:

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SO ORDERED

Lewis A. Kaplan, USDJ  
6/21/18

*Attorney for Defendants Steven Donziger, The  
Law Offices of Steven R. Donziger, and  
Donziger & Associates, PLLC*